



RECEIVED
EPA REGION VI

1985 MAR -1 AM 11:02

SUPERFUND BRANCH

Department of Energy
Strategic Petroleum Reserve Project Management Office
900 Commerce Road East
New Orleans, Louisiana 70123
85-ESH-149

February 25, 1985

Ms. Martha McKee, Chief
Superfund Compliance Section
U.S. EPA Region VI
1201 Elm Street
Dallas, Texas 75270

Dear Ms. McKee:

ERRIS DELISTING REQUEST FOR THE WEST HACKBERRY SPR FACILITY

Your letter of January 9, 1985, contained a Potential Hazardous Waste Site Identification (PHWSI) form for the West Hackberry Strategic Petroleum Reserve (SPR) facility. You stated that information contained in this form led to placement of the West Hackberry SPR facility on EPA's ERRIS list. You further suggested that notification by the SPR under Section 103(c) of CERCLA may be appropriate. Given the brief and approximate description of West Hackberry in the PHWSI form, we are providing the following supplementary information for your review of the West Hackberry site ERRIS listing.

The SPR engages in storage of crude oil in underground salt dome storage caverns for use in the event of a national energy emergency. No refining or processing of this crude oil is conducted by the SPR or on SPR lands. Such static storage of crude oil is not expected to generate hazardous waste byproducts.

Historical land use since the 1930's at the West Hackberry SPR site was discussed with Mr. Steven Lowery, a member of the family which has owned this property since the turn of the century. Mr. Lowery indicated he is unaware of any past activity by Pacific Plate and Glass (PPG) at the West Hackberry salt dome. He is aware of brine production conducted by Olin Corporation at this salt dome; however, these operations were strictly limited to solution mining of sodium chloride. There were no chemical production facilities at this location as suggested by the PHWSI form. Mr. Lowery was also aware of several unsuccessful sulphur exploration wells.

9109356



Mr. Lowery also stated that the only chemical compounds brought on site in conjunction with Olin's brine production operations were caustic soda and sodium hexametaphosphate. These compounds were injected down hole into the brine wells to precipitate and deflocculate unwanted solids within the caverns prior to brine withdrawal. He further noted that throughout Olin's tenure at West Hackberry, cattle and sheep coexisted with the brine production and sulphur exploration operations.

The SPR Geological Site Characterization Report for the West Hackberry Salt Dome (Document #SAND 80-7131) was consulted as a second source regarding historical uses of the entire salt dome. That report describes Olin Corporation as mining salt with the objective of producing brine, Cities Service Company as leaching cavern space for the storage of natural gas liquids, and several abandoned sulfur exploration wells developed by Carol Oil, Freeport Sulphur Co., Pan Am, and Union Sulfur Co. Abandoned wells located on SPR property at West Hackberry resulted strictly from brine production and sulphur exploration, with all Cities Service caverns located off SPR property. There is no evidence to suggest that these brining and sulphur exploration activities resulted in development of a hazardous waste disposal site at the West Hackberry SPR facility.

The PHWSI form was annotated with the RCRA identification number issued to the West Hackberry SPR facility in response to its 1980 RCRA notification. After conducting a thorough review of available information, the RCRA regulations and hazardous waste lists, this notification was deemed inappropriate to the SPR and its activities. Accordingly, the SPR submitted and was granted its request to be delisted (reclassified as a nonhandler) by EPA on June 18, 1982 (see enclosed letter). The West Hackberry SPR facility has since disposed of RCRA wastes (unneeded laboratory chemicals) on one occasion using a temporary generator number (see the enclosed manifest) acquired and utilized in accordance with Louisiana and Federal regulations.

Instructions accompanying the section 103(c) notification (EPA Form 8900-1) were reviewed to determine its applicability to the West Hackberry SPR facility. In regard to the section entitled "Who Must Notify," the SPR has never been engaged in the storage, treatment, or disposal of hazardous wastes pursuant to Section 3001 of RCRA. The previously mentioned laboratory chemicals (reagents no longer needed due to procedural changes) were disposed as soon as they become classified as wastes and thus not stored as hazardous wastes. Item 6 of the section entitled "Who

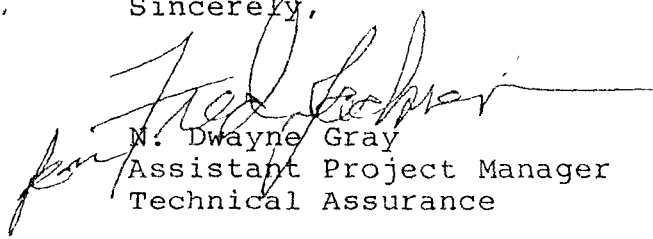
February 25, 1985

"Need Not Notify" specifically exempts notification under such circumstances where all hazardous wastes had been properly disposed off site. The section entitled "Wastes Subject to Notification" states that although polychlorinated biphenyls (PCB) are not regulated under RCRA, and thus not subject to 103(c) notification requirements, EPA has requested voluntary notification of sites containing PCBs. The West Hackberry SPR site recently decontaminated two inservice transformers from PCB concentration of 87 ppm and 12 ppm to 3 ppm and 1 ppm, respectively. All resultant PCB contaminated material was immediately removed from the site and disposed in accordance with TSCA requirements (see enclosed documentation). Thus the West Hackberry SPR facility is not a PCB treatment, storage or disposal site.

The information and circumstances surrounding past activities at the West Hackberry SPR facility do not suggest the presence of abandoned hazardous waste. Current activities at the West Hackberry facility are limited to storage cavern formation and crude oil storage, and thus not likely to generate, or result in storage, treatment, or disposal of hazardous wastes. Therefore, the reported hazardous waste site does not exist and a Section 103(c) CERCLA notification is not applicable to the West Hackberry SPR facility.

If you have any questions about this question, please do not hesitate to contact Sidney Evans at (FTS) 686-4353.

Sincerely,


M. Dwayne Gray
Assistant Project Manager
Technical Assurance

Enclosures

cc: R. Madson, POSSI